

# ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

04/25/2005

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER:

PRD091101543

INSTALLATION NAME:

**INYX USA LTD** 

**INSTALLATION ADDRESS:** 

RD 604 KM 0.1 SAN JOSE IND PK

NORTE WARD MANATI, PR 00674

**MAILING ADDRESS:** 

**PO BOX 1678** 

MANATI, PR 00674-0345

EPA Form 8700-12AB (4-80)

USEPA - REGION 2 RCRA Programs Branch 290 Broadway, 22nd Floor New York, NY 10007-1866

ATTN: RCRA NOTIFICATIONS

Tel: (212) 637-4106 Fax: (212) 637-3056

TO: INYX USA LTD

or Current Occupant

ATTN: GABRIEL RUIZ

PO BOX 1678

MANATI, PR 00674-0345

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OMB#: 2050-0028 Expires 1/31/2006

SEND COMPLETED FORM TO:	United States Environmental F	Protection	Agency	2005 APR -8 PM 4:			
The Appropriate State or EPA Regional Office.	RCRA SUBTITLE C SITE IDENTIFICATION FORM						
1. Reason for	Reason for Submittal:						
Submittal (See instructions on page 13.)	☐ To provide Initial Notification of Regulated Waste waste, universal waste, or used oil activities)	Activity (to	obtain an EPA IC	) Number for hazardous			
MARK ALL BOX(ES)	To provide Subsequent Notification of Regulated	Waste Activ	rity (to update sit	e identification information)			
THAT APPLY	☐ As a component of a First RCRA Hazardous Wat	ste Part A P	ermit Application				
	☐ As a component of a Revised RCRA Hazardous	Waste Part	A Permit Applica	ition (Amendment #)			
	☐ As a component of the Hazardous Waste Report	L.					
2. Site EPA ID	EPA ID Number						
Number (page 14)	P.R.D.0.9,1.1.0,1	P.R.D.0.911, 101, 5, 4, 3,					
3. Site Name (page 14)	Name: IN YX USA, LTD						
4. Site Location Street Address: SAN JOSE ANDUSTRIAL PARK KM							
Information (page 14)	City, Town, or Village: MANATI			R			
	County Name:		Zip Code:	7674			
5. Site Land Type (page 14)	Site Land Type: Private  County  District  Federal  Indian  Municipal  State  Other						
6. North American Industry Classification	32541	В.	2/1	-			
System (NAICS) Code(s) for the Site (page 14)	c. NA	D.	4/4				
7. Site Mailing Street or P. O. Box: PO BOX 11			78				
Address (page 15)	City, Town, or Village: MANAT	1					
	State: P.P.						
	Country: V 5 A		Zip Code: 0	10674-0345			
8. Site Contact Person	First Name: GABRIEL	MI:	Last Name: p	LUIZ			
(page 15)	Phone Number: 707-621- 6000 Extension	11705	Email address:				
9. Operator and Legal Owner	A. Name of Site's Operator:  Date Became Operator (mm/dd/yyyy):  DY 91 2005						
of the Site (pages 15 and 16)	Operator Type: Private County District Federal Indian Municipal State Other						
	B. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy): 04 01 2005				
	Owner Type: Private County District	☐ Federal	□ Indian □ Mu	nicipal 🗋 State 🗋 Other			

9. Legal Owner	Street or P. O. Box: CA	., -	2005 APR	-8 PM !	OMB#: 2050-0028 Expires 1/31/2006	
(Continued)	Street or P. O. Box: SA	<del>ہ</del> ۔	105E +M	<b>DUSTELA</b>	C PHILE KM. 1001	
Address	State: m AMATI	0	n B	RANCH		
	Country: U.S.A			Z	ip Code: 00674-0345	
10. Type of Regulated Mark "Yes" or "No	Waste Activity	any ad	iditional boxes as	instructed.	(See instructions on pages 17 to 20.)	
A. Hazardous Was	ste Activities arts for 1 through 6.					
YX N □ 1. Generator If "Yes", c	of Hazardous Waste hoose only one of the follow	ing - a	, b, or c.	Y - N 2.	Transporter of Hazardous Waste	
a. LQG	: Greater than 1,000 kg/mo (2 of non-acute hazardous was	200 lb: te; or	s./mo.)	Y 🗆 N/X 3.	Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.	
	<ul> <li>100 to 1,000 kg/mo (220 - 2, of non-acute hazardous was</li> <li>QG: Less than 100 kg/mo (22)</li> </ul>	te; or		Y - NY 4	Recycler of Hazardous Waste (at your site)	
	of non-acute hazardous v	/aste		Y 🗆 N 🗗 5.	Exempt Boiler and/or Industrial	
In addition, indicate other generator activities.				,	If "Yes", mark each that applies.	
Y ☐ N 🗹 d. United States Importer of Hazardous Waste			ste	<ul> <li>a. Small Quantity On-site Burne</li> <li>Exemption</li> </ul>		
Y 🗆 N 🕽 e. Mixe	ed Waste (hazardous and radio	active)	) Generator		<ul><li>□ b. Smelting, Melting, and Refining Furnace Exemption</li></ul>	
				YONE	. Underground Injection Control	
B. Universal Was	te Activities				ed Oil Activities	
5,000 kg o determine waste gen	ntity Handler of Universal W r more) [refer to your State what is regulated]. Indicate erated and/or accumulated a oxes that apply:	egula types it your	tions to of universal site. If "Yes",	,	rk all boxes that apply.  Used Oil Transporter  If "Yes", mark each that applies.  □ a. Transporter  □ b. Transfer Facility	
	<u>Gene</u>	ate	<u>Accumulate</u>	Y 🗆 N 💆 2.	Used Oil Processor and/or Re-refiner	
a. Batteries		3		/\	If "Yes", mark each that applies.	
b. Pesticide	s	ם			□ a. Processor □ b. Re-refiner	
c. Thermos	ats	ם		עם אואל -	Off Specification Head CV 7	
d. Lamps	)	]		, ,	Off-Specification Used Oil Burner	
	••	ב		Y 🗆 N 🗸 4.	Used Oil Fuel Marketer If "Yes", mark each that applies.	
		ם			a. Marketer Who Directs Shipment of	
Y 🗆 NX 2. Destination	n Facility for Universal Wast		C		Off-Specification Used Oil to Off-Specification Used Oil Burner  b. Marketer Who First Claims the Used Oil Meets the Specifications	
Note: A haz	ardous waste permit may be re	quired	ior this activity.			

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EPA ID NO: PRD 10911 101 5143

OMB#: 2050-0028 Expires 1/31/2006

					2000 KMS A	511 1 1 2
11. Description o	of Hazardous Wast	es (See Instruction	s on page 21.)		ZUUJ APK -8	PM 4: 16
handled at y	es for Federally Re our site. List them i age if more spaces a	n the order they are	s Wastes. Please list presented in the reg	st the waste codes o gulations (e.g., D001	f the Federal hazardou , D003, F007, U112).	is wastes Use an
DOUY	D009	D 018	D035	D040		
D007	D 010	0022	D 038	F003		
0000	Doll	0028	D039			
hazardous v	es for State-Regula vastes handled at yo s are needed for wa	our site. List them in	eral) Hazardous Wa n the order they are p	stes. Please list the presented in the reg	e waste codes of the Sulations. Use an additi	tate-regulated onal page if
J. 1						
12. Comments (S	See instructions o	n page 21.)		,		
			N			
			/#	+		
A						
				- Y		
in accordance with on my inquiry of the information submit penalties for subm	h a system designed ne person or person tted is, to the best o nitting false informat zardous Waste Part	d to assure that qual s who manage the s of my knowledge and ion, including the po	lified personnel prop system, or those per d belief, true, accura ossibility of fine and i	erly gather and eval sons directly respon te, and complete. I a mprisonment for kno	pared under my direction under the information subsible for gathering the maware that there are owing violations.  In (see 40 CFR 270.10	ubmitted. Based information, the e significant
Signature of ope	rator, owner, or ar	Name and Off	icial Title (type or p	orint)		Date Signed (mm/dd/yyyy)
Jelio P	anua X	OTHONIE	2 GARCIA,	VP OPEN	2477825	03/30/2005
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March 23, 2005

2005 APR -8 PM 4: 15

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack Hoyt
US Environmental Protection Agency
Region 2 / RCRA Programs Branch
290 Broadway, 22<sup>nd</sup> Floor
New York, NY 1007-1866

RE: Notification of Hazardous Waste Activity

EPA ID Number PRD091101543 Installation at Road No. 604 San José Industrial Park, Cotto Norte Ward, Manatí, Puerto Rico

Dear Mr. Hoyt:

As per Asset Purchase Agreement of December 15, 2004, Inyx USA, Ltd. (Inyx) acquired certain assets from Aventis Pharmaceuticals, Puerto Rico Inc. (Aventis), among which are the pharmaceutical installations and operations above referenced located at Road No. 604, San José Industrial Park, Cotto Norte Ward, Manatí, Puerto Rico. Such facility is operated under EPA Identification Number PRD091101543. This is to notify that as of April 1, 2005, Inyx will commence operating such pharmaceutical installations/operations and, therefore, is hereby requesting EPA to modify the Acknowledgment of Notification of Hazardous Waste to indicate the change of ownership. Enclosed please find EPA Form 8700-12 (Revised 3/2005), RCRA Subtitle C Site Identification Form, filled with the information necessary for EPA to make the changes and to issue an Acknowledgement of Notification of Hazardous Waste Activity in the name of Inyx.

Should further information be needed, please contact José Betancourt, Inyx Consultant, at 787-621-6000 ext. 1300.

Cordially,

INYX USA LTD.

Othopiel García

Vice President and Site Director

xc: Ramon Sanchez, Marc Courturier, Inyx

Attachment

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Fig. HofficeSun of Hazardous Wests Activity 9990 Standar PRD081101343 Installation Post State Overte Ward Standii, Surem Picc.

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THIS FORM REPLACES PREVIOUS FORM 3510-7 (8-92) Please See Instructions Before Completing This Form Form Approved, one No. 5040-6066 Appropries \$31-66

NPDES FORM

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United States Environmental Protection Agency Washington, DC 20480

Notice of Termination (NOT) of Coverage Under a NPDES General Permit for Storm Water Discharges Associated with Industrial Activity

Submission of this Notice of Termination constitutes notice that the party identified in Section II of this form is no longer authorized to discharge storm water

associated with Industrial activity under the NPDES program. ALL NECESSARY INFORMATION MUST BE PROVIDED ON THIS PORM.
t. Permit Information  NPDES Storm Water General Permit Number: P.R. 0.5.A.8.7.9 Check Here if You are No Longer Check Here if the Storm Water Discharge is Being Termineted:
II. Facility Operator Information  Name: A.V.E.N.T. I.S., P.H.A.P.MA.CE.M.T.I.C.A.L., P.D. J.N.C., J. Phone: 17.8.716, 2.11.6.0.9
Address: P.O. B.O.K. 3.45.  Chy: M.A.N.A.T.F
Name: A.V.E.N. 715. P.H.A.RMA, C.E.U.T.I.CHLS. P.R. ING
Address SA. N. JO.S.E. INOUSTRIAL PARK, RO.4604
City: MANATITE
Latinida: 11812610, 7, Longitude: 0,462814, 9 Quarier: Li Section: Li Township: Li Range: Li
IV. Certification: I certify under penalty of law first all storm water decharges associated with industrial activity from the Identified facility that are authorized by a NPDES general penalt have been eliminated or that I am no longer the operation of the licelity or positivition after. I understand that by submitting this Notice of Termination, I am no longer authorized to discharge the operation water associated with industrial activity to waters of the United States is unleavful under the Clean Water Act where the discharge is not authorized by a NPDES permit. I also understand that the submittal of this Notice of Termination does not release an operator from liability for any violations of this permit or the Clean Water Act.
Signature: Mo.NT.E. P.H. (.P.P.S.)  Date: 10.313.010.57
Institutions for Considering Links of Terminating (MOT) From

### Who May File a Notice of Termination (NOT) Form

Permittees who are presently covered under an EPA-lessed National Politient Discharge Einfoation System (NPDES) General Permit (molucing the 1886 Muti-Sector Permit) for Storm Water Dicharges Associated with Industrial Adiality may submit a Notice of Termiteation (NOT) form when their facilities no beginning submit a Notice of Termiteation (NOT) form when their facilities no begin have any storm water discharges associated with Industrial activity as defined in the storm water regulations at 40 CFR 122-25(b)(14), or when they are no longer the operator of the facilities.

For construction sictivities, elimination of all storm water discharges associated with industrial adiatry occurs when disturbed soits at the construction sits bisine been finally stabilized and temporary erector and sediment control messages have been removed or will be restroyed at or appropriate three, or their all distinuates relaxing as associated with industrial activity from the construction sits first are asshorted by a NPDES general permit have otherwise been elemented. First arbitration meens that all coll-instituting arbitilizes at the site have been completed, and that a uniform personnial vegetative cover with a density of 70% of the cover for unprevious areas and covered by permanent attackers has been established, for equivalent permanent stabilization measures (such as the use of sprap, pebions, or gestabilished have been employed.

### Where to Pile NOT Form

NOTe sent regular mail:
Stornwater Notice of Termination (4203M). Stornw

Skorumenter Notice of Fermination US EPA East birlding, Rm. 7420 1201 Constitution Avenue, NW Washington, D.C. 20004 (202) 564-9545

### Completion the Form

Type or print, using upper-case letters, in the appropriate areas only. Please place each character between the market. Abbreviate if necleasing to stay within the market of characters showed for click less, they only site space for breaks between words, but not for punduation market unless thing size space for breaks personae. If you have any questions about this form, salephone or write the floride of intent Processing Certier at 1900) 352-7755

**NPDES** Form 3510-6



United States Environmental Protection Agency Washington, DC 20460

Form Approved OMB No. 2040-0086

Notice of Intent for Storm Water Discharges Associated with INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entitiy in Section B intends to be authorized to discharge pollutants to waters of the United States, from the facility or site identified in Section C, under EPA's Storm Water Multi-sector General Permit (MSGP). Submission of the NOI also constitutes notice that the party identified in

Section B of this form has read, understands, and meets the eligibility conditions of Parl with all applicable terms and conditions of the MSGP; understands that continued authorize on maintaining eligibility for coverage, and that implementation of the permittee's pollutional days after a complete NOI is mailed. In order to be granted coverage, all informatic completed. Please read and make sure you comply with all permit requirements, including implement a storm water pollution prevention plan.	tation under the MSGP is contigent on prevention plan is required two on required on this form must be
A. Permit Selection If new, enter generic permit, otherwise enter previous permit: P L PO よんしょう	New Permit Number(EPA Use Only)
3. Mailing Address: a. Street or P.O. Box: P. B - B - B - B - B - B - B - B - B - B	Phone: 1 <u>구181구161구11140101</u> 역
3. If you are filling as a co-permittee, enter storm water general permit number:  4.a. Permit Applicant: Federal State Tribal Private Other public entity b. Is the facility located on Indian Country Lands? Yes No  5. Does the facility discharge storm water into: a. Receiving water(s)? Yes No If yes, name(s) of receiving water(s): No If yes, name of the MS4 operator: MAIMATED MYIN (ICI) IRA 4 ITEL  6. The 4-digit Standard Industrial Classification (SIC) codes or the 2-letter Activity Coprincipal products produced or services rendered by your facility and major co-local Primary: No Primary: No  7. Applicable sector(s) of industrial activity, as designated in Part 1.2.1 of the MSGP, that include associated discharges that you seek to have covered under this permit (choose up to three):  Sector A Sector B Sector B Sector B Sector C Sector C Sector A Sector B	ongitude: @66 28 49
Do you certify under penalty of law that this document and all attachments were presupervision in accordance with a system designed to assure that qualified personnel information submitted? Based on your inquiry of the person or persons who managed directly responsible for gathering the information, do you certify that the information knowledge and belief, true, accurate, and complete? Do you certify that you are away penalties for submitting false information, including the possibility of fine and imprison	properly gather and evaluate the at the system, or those persons submitted is, to the best of your are that there are significant
Print Name: 1011HP 1011E14 61AAGC1/101111111111111111111111111111111111	
om oo o (15043ed 00-2000, Explies 04-2003)	Page 1 of 2

# INSPECTOR'S MULTI-MEDIA CHECKLIST

Revised: August 2003 AVENTIS PHARMACEUTICALS P.R., INC Facility Name: SAN JOSE RD 604 MANATI, P.R. 00674 PRD 091101543 Contact: MR. RAMON SANCHEZ Phone: 787-884-7922 Inspector: ABDOOL H. JABAR Phone: 212 - 637-4131 Div./Br.: RCRA - 4WCS Date of Inspection: 6/15/04 Referred by LAN to: Date of Referral: Referrals must be made only to Program Contacts on page 2. [copy to C. Zafonte, MM Enforcement Coordinator, for tracking.] Referee is requested to provide an initial response within 3 weeks of the referral.

## GENERAL GUIDANCE

# VISUAL CUES OF POSSIBLE NON-COMPLIANCE WARRANTING INQUIRY

Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.

Stains or discoloration of soil, concrete, or floors in work areas.

- Distressed vegetation unhealthy, discolored, or dead.
- Dark smoke or dust clouds, or smoke coming from other than a smoke stack.

Unusual odors or strong chemical smells.

Sheen on surface waters.

## **CHECK IT OUT!**

... if you see or hear something suspicious during an inspection. Ask probing questions:
- What is it? Is it a waste product?

- What process produced it?

- Has it been tested?

- Where do you normally dispose of it?Do you have a permit for the disposal?
- How long has the circumstance existed?
- When did it begin?
- Pay attention to the situation, and take photographs. 0
  - Note the location and the amount of pollutant that appears to be involved.
  - Take notes describing the situation, the source of the pollutant and its emission point.

TABLE OF CONTENTS & PROGRAM CONTACTS				
Cananal Cuidanaa				<u><b>Page</b></u> 1
General Guldance		••••••		1
AIR (incl. CFCs & A	Asbestos):	Lead/cc: Backup Harish Patel/ Ken Eng	<u>p</u> 212-637-4046 -4080	3
CEPD/ESB: EMB:		Carlos O'Neill Victor Trinidad	787-729-6951(x2:	30) 26
EPCRA Toxic Rele - All other EPCRA	cc: PTSB-TS Section Chief	Nora Lopez/ Dan Kraft John Higgins	732-906-6890 732-321-6669 -6194	4
Federal Facilities:		Kathleen Malone John Gorman	e/ -4083 212-637-4008	
FIFRA:	cc: PTSB Branch Chief	Adrian Enache Ken Stoller	732-321-6769 732-321-6765	5
NJ & NY Pro NJ & NY Su	atment (industrial WW discharge to a sanit etreatment: rface & Storm Water Discharges PDES and Pretreatment:	tary system): Frank Brock Ari Harris Carlos O'Neill	212-637-3762 -3763 787-977-5821	6
Oceans:		Doug Pabst	-3797	
Public Water Suppl	y:	Doug McKenna	-4244	7
Radiation:		Jeanette Eng	-4007	7
RCRA:		Phil Flax	-4143	8
Remedial Actions in	NJ: NY & Caribbean:	Carole Petersen John Lapadula	-4418 -4262	
Removal Actions:		Richard Salkie Bruce Sprague	732-321-6658 -6656	
SPCC/FRP:		Doug Kodama	732-906-6905	9
TSCA: PCBs Chemicals	cc for both: PTSB-TS Section Chief	Dan Kraft Mike Bious Dan Kraft	732-906-6669 732-906-6892 732-321-6669	10
UIC: UST:		John Kushwara	212-637-4232	6 11
Wetlands:		David Pohle/ Daniel Montella	212-637-3824 -3801	11
Criminal Investigation	ons Division -	William V. Lom	-3634	11

# REPORTING POSSIBLE NON-COMPLIANCE

Throughout this checklist, there are YES/NO questions to be circled. If a bold YES or NO field is circled, there is a follow-up question. If you circle a field marked with an asterisk (\*), you should promptly refer the matter to the Region II office for that program. After you return from your inspection, immediately let your supervisor know that you observed possible non-compliance in another program area during your inspection. The information should then be referred to the appropriate contact listed above.

<u>Air</u>		
With the sun in a 140° arc <u>BEHIND</u> you, is opaque smoke is being emitted? <u>Note</u> : "Opaque smoke" is <u>not steam</u> will obscure anything behind it for >5 minutes.  Steam dissipates at a given point; smoke trails off.  Note relative positions of the sun, the observer and the emission point.	YES*	NO
If YES:		
Note color of smoke:		
From which specific process line is smoke coming? (e.g., "Boiler No. 4" or "Coating Line C").		
What is the cause of the smoke emission? e.g., -		
i. Is air pollution control equipment out of service, or turned off during production? <b>If YES:</b> When will it be back on line?	YES	NO
ii. Is the facility under an unusual load, using different fuels, or process feeds?	YES	NO
Have any processes been added or changed in any way in the last 2 years?	YES	NO
If YES: Did the facility obtain state or federal air pollution permits for it?	YES	NO*
Has the facility undergone any renovation or demolition during the last 18 months, involving removal or disturbance of asbestos-containing materials?	YES	NO
Approximate square or linear feet of materials involved?		
If >260 linear feet, or 160 square feet, and the facility has submitted a notification, ask for a copy and send it to ACB (this is not a referral).		
If >260 linear feet, or 160 square feet, and the facility has not submitted a notification, <b>REFER</b> to the Air Compliance Branch for followup.		
Do <u>facility employees</u> maintain, service, repair, or dispose of air conditioning/refrigeration equipment involving CFC refrigerant? [If a contractor does this work, do not refer the matter.]	YES	NO
If YES: Does facility have Recovery/Recycle or Recovery only equipment?	YES	)NO*

# **Emergency Planning and Community Right-to-know Act (EPCRA)**

# **Toxic Release Inventory (TRI)**

1. Does the facility have 10 or more full-time employees?

YES NO

b. Is the facility classified under any of the following sectors?

YES	NO ————————————————————————————————————	Type of facility manufacturing commercial hazardous waste treatment metal mining, coal mining	YES	NO	Type of facility electric utilities petroleum bulk terminals chemical wholesaler solvent recovery services.		
If the a	nswers	to both questions 1. and 2. are YES,	ask :				
	A. Is th	ne facility aware of EPCRA Section 3	13 or T	oxic Re	lease Inventory Requirements?	YES	NO*
	B. Is to	he facility aware of recent reporting the facility aware of the facility aw	hreshold	ds reduc	ction of listed chemicals manufacture	A	cessed NO*
		for either A or B is No, provide EPA pr CRA - Toxic Release Inventory: 732	1000		for compliance assistance.		
All O	ther E	EPCRA:				*	
a.	thresholder thresh	e on-site any of the 360 "Extremely Hold planning quantities (which vary by S: Were the State Emergency Responing Committee (LEPC) notified of these	/ chemi se Com	cal, and missior	range from 1 to 5000 lb.)?  (SERC) and Local Emergency	YES	NO*
a.	hazarde If YES If YES	e facility had a release of an Extremel ous substance in excess of the Superfice. Was notification of the release provides:  i. To whom was the notification give ii. Was notification oral or written?  iii. If oral, was a written, follow-up	und report	ortable of submitt	quantity (assume 1 lb.)? ed?		* NO NO*
b.	Does th	facility does not know the answers to he facility have on site Material Safety cals used, as required under OSHA's F	y Data S	Sheets (	MSDS) for all hazardous	YES	NO*
c.	If the f	Cacility has >10,000 lb of any hazardon hold planning quantities, have MSDS given to state and local emergency pla	us chem (or a li	nicals, o st of M	r Extremely Hazardous Substances SDS), and chemical inventory forms	YES	NO*

# Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

1.	If inspecting a manufacturing facility, ask:	
A. <i>A</i>	Are any pesticides manufactured, relabeled, or repackaged at this establishment?  Pesticide is any substance or mixture intended (1) to prevent, destroy, repel, or mitigate any pest, or (2) for use as a plant regulator, defoliant, or desiccant.	YES NO
B. I	f A. is YES, does the establishment have an EPA Establishment Number? (All production, relabeling and/or repackaging must be registered with EPA.)	YES NO*
C. If	B. is Yes, enter the Establishment Number: and continue:	
D. (e	Has the company filed the Annual Pesticide Production Report form? due March 2 of each year for the previous calendar year's production.)	YES NO*
2.	If inspecting a storage-distribution facility or a retail facility, ask: $N/A$	
A. <i>A</i>	Are any pesticides being held for sale/distribution, or stored at this facility (warehouse)?	YES NO
B. I	f A. is YES, are restricted-use pesticides stored, or held for distribution/sale at this facility?	YES* NO
C. A	Are any containers leaking?	YES* NO
D. <i>A</i>	Are pesticides stored next to acid, caustic and/or oxidizing materials?	YES* NO
3.	If pesticides may not have been properly used, observe and record any effects such as human adverse reaction(s), dead fish, birds, or wildlife, plant damage, etc, and ask:	N/A
	<ul> <li>A. Have pesticides been applied by an employee or by a pesticide application company?</li> <li>B. If A. is YES, ask for: <ul> <li>Date of application,</li> <li>Name of pesticide applied,</li> <li>Name of pesticide applicator company, or facility person who made the application,</li> <li>Address and/or phone number of pesticide applicator company (if applicable),</li> <li>Type of health complaints from employee (if applicable),</li> </ul> </li> </ul>	YES* NO
	- Contact person for follow-up.	WIA
4.	If inspecting a public housing, educational, or day care facility, farm market, flea market, spa or health facility, beauty parlor, or private housing, are pesticides sold there?	YES* NO
	A. If <b>4. is YES</b> , are the pesticides registered for agricultural use ( <b>see label</b> )  If you suspect, or are unsure if the pesticides are registered for agricultural use, * <b>Refer</b> *.	YES* NO
	<ul> <li>B. If A. is YES, ask for:</li> <li>Name and identity (e.g farmers, homeowners, pesticide applicators, etc.) of the buyers,</li> <li>Address and telephone number of the buyers,</li> <li>Name(s) of pesticide purchased,</li> <li>EPA Registration Number (EPA Reg. No.) of pesticide(s) purchased.</li> </ul>	
	C. Are pesticides sold in unlabeled containers or with hand-written labels.	YES* NO
Note:	If you suspect but are unsure that posticides are being sald in unlabeled containing	

Note: If you suspect, but are unsure, that pesticides are being sold in unlabeled containers, or with hand-written labels, \*REFER\* this.

# NPDES, Pretreatment & UIC

1. Does the facility generate industrial wastewater (IW), sanitary wastewater (WW) and/or

	Public Water Supply		
^ K	Refer this to water program (to WCB, if the site is in NY or NJ; to CEPD's ESB, if in PR or VI).		
	. How is it treated? BIOCOGICAL TREATMENT, PH adjustment	YES	NO
c.	If you answered question 3b, ask what SIC code(s) describe all the facility's activities <sup>1</sup> :		
b.	If you answered yes to question 1a or 1c for storm water, but the facility does not have a storm water discharge permit, ask why (facility may not be subject to stormwater requirements):		
3a.	Has the facility applied for a permit for each discharge noted in question 1?  If permitted, ask for permit numbers PRASA GDA 93-210-037	YES	NO*
d.	Ask what types of fluids enter drains/structures:		
c.	If YES to a, is there evidence that contaminants entered drain/structure? (e.g., discolored or smelly fluid; stained drain or floor nearby)	YES*	NO
b.	If YES to a, is there fluid in the drain/structure?	YES	NO
2a.	Are there floor drains, sinks (not in bathrooms), or storm water collection structures: - where raw materials, products, wastes or wastewaters are generated, stored or transported &/or - that are possibly receiving wastes due to poor housekeeping, etc.?	YES	NO
Ide	ntify the water bodies and/or sewer system: UN NAMED CREEK.		×
f.	Onto ground surface (e.g. spray, discharge pipe, open trench)	WW	SW
e.	Is any of it trucked off site?	WW	SW
	To a subsurface disposal system (septic system, drywell, cesspool, sinkhole)?IW*	WW	SW
c.	To a storm water sewer system?IW*	WW*	SW
b.	To a sanitary sewer system that discharges to a municipal treatment plant (POTW)?IW	(WW)	SW
a.	To a receiving stream/surface water body (or onto ground near enough to impact one)? IW	WW	SW
	storm water (SW) and dispose of any of it as follows (Circle as applicable):		

1. **Observe/Ask:** Does the facility have its own potable water supply?

<sup>&</sup>lt;sup>1</sup> If the first 2 digits of any facility SIC code are 10-14, 20-45 or 51, or if facility is a landfill/land application site, recycler, hazardous waste TSD, or steam electric power generator, or if there are construction activities covering >5 acres, refer this to the water program (WCB, if the site is in NY or NJ; CEPD's ESB, if in PR or VI).

2. If YES, does the facility provide potable water for 25 or more persons?

YES NO

3. If YES, is the water analyzed for contaminants & results reported to the state?

YES NO\*\*

\*\* Refer this to water program (to WCB, if the site is in NY or NJ; to CEPD's EMB, if in PR or VI).

# Radiation

1. Are radioactive materials used or stored at this facility?

YES NO

2. If YES, does the facility have a state or federal radiation license for them?

YES NO\*

# **Resource Conservation & Recovery Act (RCRA)**

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), **DO NOT** answer the rest of the RCRA questions, but enter the facility's EPA ID #:

	the facility does not have this ID number, ask:  A. Has the facility determined that it generates hazardous waste?  If YES, ask how the determination was made:  If NO, skip Questions 2 to 8 and go to Question 9. If YES, continue:	YES	NO
]	3. If the facility generates or transports hazardous waste, ask for its  EPA ID No.?  If the facility cannot produce an ID Number, *REFER*.]		
2	A. Are there containers or tanks that hold hazardous waste?  If <b>NO</b> , go to Question # 3. If <b>YES</b> , continue:	YES	NO
]	3. Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date?	YES	NO*
(	C. Do hazardous waste storage tanks have secondary containment (berm, vault, double walls)?	YES	NO*
. ]	D. Does the facility store hazardous waste in containers or tanks for >90 days?	YES*	NO
3.	Does the facility store, treat or dispose of hazardous waste in lagoons, pits, piles or landfills?	YES*	NO
4.	Does the facility treat hazardous waste by incineration, precipitation, neutralization, or other means to change the physical or chemical nature of the waste?	YES*	NO
5.	Does the facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)?	YES*	NO
6.	Does the facility maintain copies of hazardous waste manifests on-site?	YES	NO*
7.	Do hazardous waste storage or treatment units ( <u>e.g.</u> , containers or tanks) appear to be poorly maintained and may release hazardous waste to the environment?	YES*	NO
8.	Do chemicals or wastes appear to have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges?	YES*	NO
9.	A. Does facility generate non-hazardous process wastes, excl. office paper, cafeteria wastes, etc? If <b>NO</b> , go to Question 10. If <b>YES</b> , continue:	YES*	NO
]	3. What type of non-hazardous wastes does the facility handle? ( <u>e.g.</u> , treatment sludges, ash, solvents, waste oils)		
(	C. Very briefly describe the process(es) that generate the wastes in Question 9B.		
Do	waste generation, handling, management or disposal appear to, or threaten to, cause environmental damage?	YES*	NO

# **Spill Prevention, Control & Countermeasure (SPCC)**

1. A. Does the facility store oil, whether petroleum, vegetable or transformer oil? NO 1. B. If YES, does the storage capacity exceed: 1320 gallons in all aboveground storage tanks? NO 42,000 gallons in underground storage tanks (USTs)? YES\* NO (Excluding USTs that come under EPA's UST regulation at 40 CFR §280, or a State-delegated UST regulation 40 CFR §281 - - ASK THE FACILITY REPRESENTĂTIVE: SINČE THE TANKS MUST BE REGISTERED, THE FACILITY REP SHOULD KNOW.) List aboveground oil storage capacity: 10,000g 1/2 2,600 (4 Tanhs)

List underground oil storage capacity:

- 2. If the answer to either part of #1. B. was YES, did the facility show you a copy, or have available a Spill Prevention, Control, and Countermeasure (SPCC) Plan? YES NO\*
- 3. Did the facility have an oil spill within the last 12 months that reached surface waters? SPILL OF 50 gallons Contained.

NO

Note:

If any one of the items denoted above for referral with an asterisk (\*) are present, and the total above ground oil storage capacity of the facility is 20,000 gallons or greater, refer the facility for followup action by the SPCC program

If any one of the items denoted above for referral with an asterisks (\*) are present and the total above ground oil storage capacity of the facility is less than 20,000 gallons, please refer the facility to the SPCC program for informational purposes. These facilities are generally a low priority for the SPCC program, and are seldom inspected.

If completion of the above questions will result in a referral for followup action, if possible take pictures of the tanks, provide a brief description of the distance from the tanks to the nearest surface water, and forward this information along with the referral.

# Facility Response Plan (FRP)

1. Does the facility have an above-ground oil storage capacity 42,000 gallons and conduct operations that include overwater transfers of oil to or from vessels? YES\* NO

2. Does the facility have oil storage capacity one million gallons?

YES\* NO

3. Did the facility submit a Facility Response Plan to the EPA?

YES NO

# **Toxic Substances Control Act (TSCA)**

# **Polychlorinated Biphenyls** (PCBs)

<u>SAFETY WARNING</u>: Stay ten feet from any high voltage conductors.

1. Is there liquid-filled electrical equipment (transformers, capacitors) manufactured before 1980? (Exclude equipment with <3 lb (1 quart) of fluid. Only include utility-owned equipment when inspecting a utility.)	YES NO
A. If <b>Yes</b> , how many of the above are transformers containing: PCBs >500 ppm?  <500 ppm but 50 ppm? fluid of unknown PCB concentration?	
B. If Yes, how many of the above are capacitors?	*
2. Are there hydraulic systems manufactured before 1980 that use/used high temperature fluid?	YES NO
A. If Yes, has each system been tested for PCBs?	YES NO*
B. Do any currently have PCB concentrations 50 ppm?	YES* NO
3. Does the facility have any oil-filled heat transfer systems manufactured before 1980?	YES NO
A. If Yes, has each system been tested for PCBs?	YES NO*
B. Do any currently have PCB concentrations >50 ppm?	YES* NO
4. Does the facility have PCB waste stored for disposal?	YES NO
OBSERVE PCB Items (transformers, capacitors, containers) Are any leaking?	YES*
Do all (except transformers $<$ 500 ppm) have a <b>PCB Mark M</b> <sub>L</sub> ?	YES NO*
<b>OBSERVE PCB Waste:</b> In addition to the PCB Mark M <sub>L</sub> , is PCB waste in storage for disposal marked with the <b>date removed from service for disposal</b> ?	YES NO*
Is PCB waste currently stored for more than 30 days in any area?	YES NO
If YES, is the storage area included in a RCRA permit for storing hazardous waste in containers?	YES NO
If <b>NO</b> , does the area have a roof and walls to keep out rain? a 6"-high impervious containment berm? a PCB Mark $M_L$ for the area? a location not in a 100-year flood plain?	YES NO* YES NO* YES NO* YES NO*
General Chemical Regulations: Does the facility manufacture, or import into the	
United States, any chemicals for which they are the sole manufacturer/importer?	YES NO

Does any UST have >10% volume underground <b>and</b> contain petroleum products or CERCLA hazardous substances?	YES	NO
Do all USTs store fuel oil for on-site heating?  If YES, the facility is exempt. Do not complete the rest of the UST questions.	YES	NO
Name the petroleum product or hazardous substance in each UST.		
Is there evidence of UST leakage/spillage?  * Refer facility to the Water Compliance Branch.	YES*	NO
Wetlands		
<ol> <li>A. Are wet areas (marshes, swamps, bogs) on or adjacent to the site?</li> <li>(A federal wetland need not have standing water or wetland-type vegetation; some wetlands have shrubs and trees.)</li> </ol>	YES	10
B. Are there any waterbodies or waterways on or adjacent to the site?	YES	NO
2. If # 1. A <b>OR</b> B is <b>YES</b> , is any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the areas, <b>or</b> is there any evidence that such activities occurred very recently?	YES	NO
3. If <b>YES</b> , when was the work undertaken? Does the facility have any permits for this work?	YES	NO*
4. If YES, what agency(s) issued the permits?  e.g., U.S. Army Corps of Engineers; State environmental agency.  For federal permits, what type of permits are they (i.e., nationwide, regional, individual)?		
If facility is unable to provide adequate response to # 4, *REFER*.		
*		
CRIMINAL ACTS		
During the course of this inspection, hasanything been brought to your attention indicating:		
1. That the facility is involved in deliberate acts of dumping or discharging wastes	YES*	NO
2 Bad intent or conduct? e.g., falsification of records or efforts to conceal activities?	YES*	NO
3. Actual harm to individuals as a result of violations?	YES*	NO
4. Other activity or behavior that you believe indicates criminal behavior?	YES*	NO
* Refer to Criminal Investigation Division, if you checked YES.		

¥

RCRAIS FILE



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

# AUG 3 1 2004

# CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Article number: 7002 2030 0006 5358 4683

Mr. Ramon Sanchez, Team Manager Aventis Pharmaceuticals PR Inc. PO Box 345 Road 604 San Jose Manati, P.R. 00674

Re:

**Notice of Violation** 

Aventis Pharmaceuticals PR Inc.

PRD091101543

Dear Mr. Sanchez:

The U.S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq.

Pursuant to RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), the EPA promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 C.F.R. Parts 260-272. For the purposes of this Notice of Violation, the hazardous waste regulations governing the generation of hazardous waste were promulgated in 1980 and amended by HSWA in 1984.

This Notice of Violation (NOV) is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by RCRA and HSWA, 42 U.S.C. §§ 6901, 6928.

From a review of manifests, it has been determined that the facility is a Large Quantity Generator (LQG).

On or about **June 15, 2004** pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, a duly authorized representative of EPA conducted a RCRA Hazardous Waste Compliance Evaluation Inspection (CEI) of Aventis Pharmaceuticals PR Inc. As a result of that inspection, the following violations were found:

Pursuant to 40 C.F.R. § 262. 34(a), a LQG may accumulate hazardous waste on site, without a permit or interim status for 90 days or less provided that the generator complies with the requirements of (a)(2) and (a)(3) of this section. The LQG also has to comply with Subpart I of Part 265 (management of containers), Subpart C of Part 265 (preparedness and prevention), Subpart D (contingency plan and emergency procedures) and Part 265.16 (personnel training) among other regulations.

- (1)(a) 40 C.F.R. § 262.34 (a) and 40 C.F.R. § 265.173 (a) require that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- (b) At the time of the inspection, there was 1 open fifteen gallon container storing hazardous waste in a satellite accumulation area in the QA/QC laboratory.
- (c) Aventis Pharmaceuticals PR, Inc.'s failure to close the containers as alleged in 1 (a) is a violation of 40 C.F.R. § 262.34 (a) and 40 C.F.R. § 265.173 (a).
- 2(a) 40 C.F.R. § 265.16 (d) requires that the owner or operator of a facility must maintain the following documents and records at the facility:
- (1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- (2) A written job description for each position listed under (d)(1) of this Section. This description may be consistent in its degree of specificity with the descriptions for other similar positions or bargaining unit, but must include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position;
- (3) A written description of the type and amount of both introductory and continuing training given to each person filling a position listed under paragraph (d)(1) of this section.
- (b) At the time of the inspection, Aventis Pharmaceuticals PR, Inc. did not have any of the documents required in paragraph 2 (a).
- (c) Aventis Pharmaceuticals PR, Inc.'s failure to maintain the documents required in paragraph 2 (a) is a violation of 40 C.F.R. § 265.16 (d).
- 3(a) 40 C.F.R. § 265.52 (c) requires that the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37.
- (b) At the time of the inspection, Aventis Pharmaceuticals PR, Inc. did not have such arrangements in their contingency plan.
- (c) Aventis Pharmaceuticals PR, Inc.'s failure to have the arrangements as alleged in 3 (b) is a violation of 40 C.F.R. § 265.52 (c).
- 4(a) 40 C.F.R. § 265.52 (e) requires that a facility's contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and physical description of each item on the list, and a brief outline of its capabilities.
- (b) At the time of the inspection, Aventis Pharmaceutical PR, Inc. did not include a list of emergency equipment in its contingency plan. It also did not include the location, physical description and a brief outline of each equipment's capability.
- (c) Aventis Pharmaceutical PR, Inc. failure to have a list of emergency equipment and to include the location, physical description and brief outline of each equipment's capability is a violation of 40 C.F.R. § 265.52 (e).

Please submit, within thirty (30) days of the receipt of this correspondence, a response which includes [1] a description of the actions you have taken to correct the violations cited above and [2] documentation demonstrating that the violations have been corrected.

Failure to comply and submit the documentation requested in this Notice of Violation may subject you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this letter, please contact Mr. Abdool Jabar at 212 637-4131.

Sincerely yours,

## Original signed by George Meyer

George C. Meyer, P.E., Chief RCRA Compliance Branch

CC:

Carmelo Vasquez, EQB Carlos O'Neill, CEPD

bcc:

RCRA files ~

A. Jabar, DECA-RCB

**RCB Files** 

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# RCRA INSPECTION REPORT: Aventis Pharmaceuticals PR, Inc. Road 604 San Jose Manati, PR 00674

Inspector: Abdool Jabar, USEPA, Environmental Engineer

Date of Inspection:

6/15/04

EPA Handler ID #:

PRD091101543

Reason for Inspection:

Compliance Inspection

Attendees:

Abdool Jabar, USEPA Region II DECA-RCB, (212) 637-4131

Ramon Sanchez, EHS Manager

Gabriel Ruiz, Environmental Engineer

# Background:

Aventis Pharmaceuticals is a pharmaceutical company that was formed by the merger of a French pharmaceutical company, Rhone Poulenc and a German pharmaceutical company, Hoechst. In the near future, it will be merged with another French pharmaceutical company, Sanofi. Aventis is a world leader in the discovery, development and marketing of innovative pharmaceutical products. It focuses its activities in important therapeutic areas such as oncology, cardiology/thrombosis, respiratory/allergy, diabetes, arthritis/osteoporisis and the central nervous system. At the time of the inspection, Aventis Pharmaceuticals PR, Inc. was formulating an aerosol spray that is used in treating asthma. This facility also manufactures creams and ointments for various applications. A review of information from RCRAInfo determined that the facility is a large quantity generator. Among the hazardous waste generated are spent solvent, fluorescent light bulbs, corrosive liquid (acidic), spent mineral spirits and lab packs. An opening conference was held with the facility representatives and the scope of the inspection was discussed. The inspector also gave the facility representatives a list of documents that was to be presented for review. At the conference, the facility representatives stated that there are two hazardous waste container storage areas on site and a number of satellite accumulaion areas. After the conference, a site tour was conducted.

# **Inspection Summary**

The first area visited was one of the hazardous waste container storage area. There were two 30 gallon containers storing hazardous waste. The containers were labeled with the words "hazardous waste" and had the accumulation start dates on them. The container storage area had a telephone and an alarm nearby. When the operator is handling hazardous wastes, a two-radio is available for his use.

The next area visited was the QC/ HPLC laboratory. In this lab there were 2 labeled 15 gallon containers, one of which was open. There were 3 labeled 5 gallon containers. The chemical laboratory was next visited. In this area, there were 1 labeled container (5 gal) and 40 liters of hazardous waste accumulating in 8 satellite containers which were labeled and placed in a hood. Although, the facility was not in violation, the issue was raised as to why the facility was accumulating hazardous waste in a number of containers (one for each waste code) in the hood when the facility can use the hazardous waste container storage area which was in close proximity. The facility promised to review its policy with regards to hazardous waste accumulation and storage.

The inspection continued with a visit to the second container storage area. There was a shipment of hazardous waste earlier in the day. There was one labeled 4 liter container storing hazardous waste. In the maufacture area, the facility showed the inspector a room which was away from the processing area and is used as a satellite area. At the time of the inspection, there was no hazardous waste in the container that was in the area because the facility was not formulating the product at that time.

# RCRA INSPECTION REPORT: Aventis Pharmaceuticals PR, Inc. Road 604 San Jose Manati, PR 00674

The inspector informed the facility representatives that the area cannot be a satellite area because it is not near to the point of generation and has to be treated as a container storage area. The facility promised to treat the area as a container storage area when they start to manufacture the product again and accumulate hazardous waste.

## RECORD REVIEW

## **Manifests**

Manifests for the past three years were reviewed and there were no problems.

# **Personnel Training**

Personnel training records were reviewed. The facility did not have a job title and the name for each person managing hazardous waste. The facility did not have a written job description for each position above. The facility did not have a written description of the introductory and continuing training that will be given to each person managing hazardous waste.

# **Contingency Plan**

The contingency plan was reviewed and there were no description of arrangements agreed to by the local authorities to coordinate emergency services and no list of emergency equipment in the plan.

# **Emergency & Preparedness**

The documentation was reviewed and found to be acceptable.

# Weekly Inspection

The weekly inspection log was reviewed and inspections were done.

## **Violations**

- (1) There was one 15 gallon container which was open.
- (2) The facility's contingency plan had no description of the arrangements made by the facility and the police department, fire department, hospital, contractors, and State and local emergency response teams to coordinate emergency services.
- (3) The facility did not have a job title and the name for each person managing hazardous waste.
- (4) The facility did not have a written job description for each position above.
- (5) The facility did not have a written description of the introductory and continuing training that will be given to each person managing hazardous waste.

## Closing conference

A closing conference was held and the facility was informed of the violations.

## Enforcement

A Notice of Violation will be sent to the facility.



# ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

02/06/2001

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PRD091101543

INSTALLATION NAME

AVENTIS PHARMACEUTICALS PR INC

INSTALLATION ADDRESS

RD 604 SAN JOSE COTTO NORTE IND PK MANATI, PR 006748504

MAILING ADDRESS -

PO BOX 345 MANATI, PR 006748504

EPA Form 8700-12AB (4-80)

USEPA - REGION 2 RCRA Programs Branch 290 Broadway, 22<sup>nd</sup> Floor New York, NY 10007-1866

ATTN: JACK HOYT

Tel: (212) 637-4106 Fax: (212) 637-4949

TO: AVENTIS PHARMACEUTICALS PR INC

or Current Occupant

ATTN: GERMAN HEREDIA - ENV ENGR

**PO BOX 345** 

MANATI, PR 00701

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Form Approved, OMB No. 2050-0028 Expires 12/31/02 GSA No. 0246-EPA-OX

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## Notification of Regulated Waste Activity

EPA .

United States Environmental Protection Agency

Date Received (For Official Use Only)

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### Aventis Pharmaceuticals Puerto Rico Inc.



January 12, 2001

U.S. EPA Region 2 Division of Environmental Planning and Protection RCRA Programs Branch 290 Broadway Street, 22n Floor New York, New York 10007-1866

RE: FORM 8700-12- SUBSEQUENT NOTIFICATION; COMPLETED FORM FACILITY NAME CHANGE
AVENTIS PHARMACEUTICALS P.R. INC. (formerly Rhone-Poulenc Rorer P.R. Inc.) PRD091101543

Dear Sir or Madam:

Enclosed please find form 8700-12 completed. The name of the facility was changed on December 12, 2000. The new name is Aventis Pharmaceuticals Puerto Rico Inc. Should you have any comment or question please contact us at (787) 621-6000.

Regards,

Claude Bourgon General Manager

c.c. Mr. José Jaime Lajara
Puerto Rico Environmental Quality Board
Land Pollution Control Area
P.O. Box 11488
Santurce, Puerto Rico 00910-1488

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### EUGENE W. SCOTT & ASSOCIATES

ARCHITECTS-ENGINEERS / G.P.O. Box 3028, San Juan, Puerto Rico 00936 / (809)754-5500

January 19, 1989

U.S. EPA REGION II 26 Federal Plaza New York, N.Y. 10278

Re:

RPC, Inc.

A Rorer Company Manatí, Puerto Rico

Dear Sirs:

RPC, Inc. (Rorer), formerly USV Laboratories, Inc. (USV), is a manufacturing pharmaceuticals facility recently registered to do business in Puerto Rico. Rorer bought the USV facilities at the end of 1987. At this moment they are transferring all the documents from USV to Rorer.

By this means Rorer is requesting an EPA ID Number to manage hazardous waste as a small quantity generator (less than 1000 kg/month). The facility has an EPA ID Number (PRD 091101543) as USV. They are now requesting an ID Number under the new name and they are requesting to eliminate the old number under USV Laboratories. The facility needs this number as soon as possible.

Enclosed please find the application for the Notification of Hazardous waste activities. The hazardous waste to be generated are all residues from laboratory and some residues from the production areas (cleaning activities).

Should you have any questions, please call me.

Cordially,

René Silva Cofresí

Manager

Environmental and Permit

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B. Ha	zardous Wastes from	m Specific Sources. En nstallation handles. Use	iter the four-digit number fr additional sheets if necess	om 40 <i>CFR</i> Part 261.	32 for each listed hazar	dous waste from
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C. Co.	emmercial Chemical ur installation handle	Product Hazardous Wass which may be a hazar	astes. Enter the four-digit n dous waste. Use additional	umber from 40 CFR I sheets if necessary	Part 261.33 for each che	emical substance
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D. List pita	ted Infectious Waste als, or medical and re	es. Enter the four-digit research laboratories you	number from 40 CFR Part 20 ir installation handles. Use	61.34 for each hazard additional sheets if n	dous waste from hospital ecessary.	als, veterinary hos-
	49	50	51	52	53	54
E. Cha	aracteristics of Nonlar installation handles	listed Hazardous Waste s. (See 40 CFR Parts 26)	es. Mark 'X' in the boxes cor 1.21 — 261.24)	responding to the ch	aracteristics of nonlisted	d hazardous wastes
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EPA Form 8700-12 (Rev. 11-85) Reverse

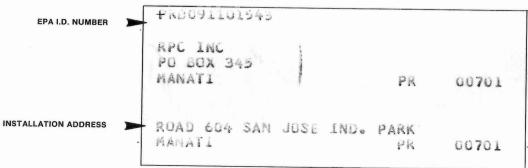
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### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act(RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA Form 8700-12B (4-80)

01/30/89



#### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

·PRD091101543

USV LABS INC AND PR DEVELOPMENT CORP

PO BOX 345

R 00701

INSTALLATION ADDRESS

SAN JOSE RD PR604 ST HWY NO 2

MANATI

PR 00701

EPA Form 8700-12B (4-80)

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CONTINUE ON REVERSE

EPA Form 8700-12 (6-80)

1	SEPA		ENVIRONMENTAL PROTECTION AGENCY ION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the
	INSTALLA- TION'S EPA I.D. NO.	The second secon	INTED LABEL HAS BEEN RECEIVED ATTACH IT IN THIS SPACE AND	information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is
	NAME OF IN-	LEAVE ITEM	S I, II AND III BLANK	complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted
	INSTALLA-			label, complete all items. "Installation" means a single site where hazardous waste is generated,
1	II. MAILING ADDRESS	PLEA	SE PLACE LABEL IN THIS SPACE	treated, stored and/or disposed of, or a trans- porter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFI-
			15	CATION before completing this form. The information requested herein is required by law
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	M = NON-FE	56	C. TREAT/STORE/DISPOSE	D. UNDERGROUND INJECTION
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	A. AIR	B. RAIL	63 64 65	HER (specify):
	Mark "X" in the ap	SUBSEQUENT No propriate box to indi	icate whether this is your installation's first notification of	hazardous waste activity or a subsequent notification.
	If this is not your fi	rst notification, ente	r your Installation's EPA I.D. Number in the space provid	ed below.
				C. INSTALLATION'S EPA I.D. NO.
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\* Infectious Wastes not yet published by EPA (§ 261.34)

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### RHÔNE-POULENC RORER PUERTO RICO INC.

P.O. BOX 345 MANATI, P.R. 00674 TEL. (809) 854-1058

March 24, 1998

Jorge Meyer, Director RCRA Compliance Branch USEPA – Region II Permits Administration Branch 290 Broadway New York, N.Y. 10007-1866

RE:

NOTIFICATION OF REGULATED WASTE ACTIVITY

SUBSEQUENT NOTIFICATION – UPGRADE STATUS REQUEST

RHONE-POULENC RORER P.R., INC.

INSTALLATIONS EPA ID NUMBER: PRD091101543

Dear Mr. Meyer:

Please find enclosed EPA Form 8700-12 "Notification of Regulated Waste Activity" regarding a Subsequent Notification for our facility in Manatí, Puerto Rico.

This "Subsequent Notification" corresponds to an Upgrade Status Request for our facility from Small Quantity Generator to Generator. The reason for this request is that due to an increase in the manufacturing operations at our facility in Manatí, Puerto Rico more than 1,000 kg/mo of hazardous wastes, consisting mainly of spent isopropyl alcohol, will be generated. Hazardous wastes will be stored at the facility for less than 90 days, as established. In addition to this notification, the facility has prepared a Hazardous Generator Contingency Plan, as established on 40 CFR 403.8, 264 and 265, copy of which is available at the facility.

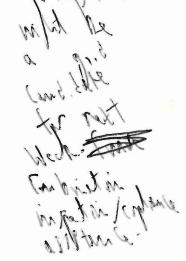
Should you have any comments or questions regarding the aforementioned enclosure or any other additional information, which might be required, please contact us at (787) 854-1058.

Regards,

Pedro A. Cortes

**Environmental Engineer** 

Enc.





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Plesse refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Acti.

## Notification of Regulated Waste Activity

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1. Generator (See Instructions) 2. a. Greater than 1000kg/mo (2,200 lbs.) 3. b. 100 to 1000 kg/mo (220-2,200 lbs.) 5. c. Less than 100 kg/mo (220-2,200 lbs.) 2. Transporter (Indicate Mode in boxes 1-5 below) 3. For own waste only 4. For commercial purposes  Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify  A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes cononlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20  B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need)  1. Stories of the sactive of the second missing	(at 1. Used Oil Recycling Marketer It is a. Marketer Directs Shipment of User Oil to Off-Specification Burner b. Marketer Who First Claims the Used Oil Meets the Specifications  2. Used Oil Burner - Indicate Type(s) of Combustion Device a. Utility Boiler b. Industrial Boiler c. Industrial Furnace  3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s) a. Transporter b. Transfer Facility  4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les) a. Process b. Re-refine  10. 261.24)  11. Used Oil Recycling Marketer in Shipment of User Oil Burner - Indicate Type(s) of Combustion Device(s) a. Transporter b. Transfer Facility  4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les) a. Process b. Re-refine
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C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number	; See instructions.)
	5 6
X. Certification  I certify under penalty of law that this document and all attachments were prepared un a system designed to assure that qualified personnel properly gather and evaluate the person or persons who manage the system, or those persons directly responsible for gis, to the best of my knowledge and belief, true, accurate, and complete. I am aware that information, including the possibility of fine and imprisonment for knowing violations.	information submitted. Based on my inquiry of the athering the information, the information submitted there are significant penalties for submitting false.
Signature Name and Official Title (Type of	
XI. Comments	
Note: Mail completed form to the appropriate EPA Regional or State Office. (See Sec	

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### RHÔNE-POULENC RORER PUERTO RICO INC.

P.O. BOX 345 MANATI, P.R. 00674 TEL. (809) 854-1058

March 24, 1998

Jorge Meyer, Director RCRA Compliance Branch USEPA – Region II Permits Administration Branch 290 Broadway New York, N.Y. 10007-1866

RE: NOTIFICATION OF REGULATED WASTE ACTIVITY

SUBSEQUENT NOTIFICATION - UPGRADE STATUS REQUEST

RHONE-POULENC RORER P.R., INC.

INSTALLATIONS EPA ID NUMBER: PRD091101543

Dear Mr. Meyer:

Please find enclosed EPA Form 8700-12 "Notification of Regulated Waste Activity" regarding a Subsequent Notification for our facility in Manatí, Puerto Rico.

This "Subsequent Notification" corresponds to an Upgrade Status Request for our facility from Small Quantity Generator to Generator. The reason for this request is that due to an increase in the manufacturing operations at our facility in Manatí, Puerto Rico more than 1,000 kg/mo of hazardous wastes, consisting mainly of spent isopropyl alcohol, will be generated. Hazardous wastes will be stored at the facility for less than 90 days, as established. In addition to this notification, the facility has prepared a Hazardous Generator Contingency Plan, as established on 40 CFR 403.8, 264 and 265, copy of which is available at the facility.

Should you have any comments or questions regarding the aforementioned enclosure or any other additional information, which might be required, please contact us at (787) 854-1058.

Regards,

Pedro A. Cortes

**Environmental Engineer** 

Enc.

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GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The Information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

### Notification of Regulated Waste Activity PA United States Environmental Protection Agency

**Date Received** (For Official Use Only)

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1. Generator (See instructions)  3. Treater, Storer, Disposer (at installation) Note: A permit is installation) Note: A permit is required for this activity, see instructions.  1. Used Oil Recycling Marketer  a. Marketer Directs Shipment of L Oil to Off-Specification Burner instructions.  4. Hazardous Waste Fuel  1. Used Oil Recycling Marketer  a. Marketer Directs Shipment of L Oil to Off-Specification Burner instructions.  4. Hazardous Waste Fuel  Used Oil Recycling Marketer  b. Marketer Who First Claims the Used Oil Meets the Specification	A. Hazardous Waste Activity  1. Generator (See instructions)  a. Greater than 1600kg/mo (2,200 lbs.)  b. 100 to 1000 kg/mo (220-2,200 lbs.)  c. Less than 100 kg/mo (220 lbs)  2. Transporter (Indicate Mode in boxes 1-5 below)  a. For own waste only  b. For commercial purposes  Mode of Transportation  1. Air  2. Rail  3. Treater, Storer, Disposer (installation) Note: A permit required for this activity, so instructions.  4. Hazardous Waste Fuel a. Generator Marketing to Burn b. Other Marketers c. Boiler and/or industrial Furnace 1. Smelter Deferral 2. Small Quantity Exemptic Indicate Type of Combustic Device(s)	B. Used Oil Recycling Activities  at 1. Used Oil Recycling Marketer a. Marketer Directs Shipment of Us Oil to Off-Specification Burner b. Marketer Who First Claims the Used Oil Meets the Specification Used Oil Burner - Indicate Type(s) of Combustion Device a. Utility Boiler b. Industrial Boiler c. Industrial Furnace 3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
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A content than 100kg/mo (22.00 lbs.)	A. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) 2. Transporter (indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes  Mode of Transportation 1. Air 2. Rail  Installation) Note: A permit required for this activity, so instructions. 4. Hazardous Waste Fuel a. Generator Marketing to Burn b. Other Marketers c. Boiler and/or industrial Furnace 1. Smelter Deferral 2. Small Quantity Exemptic Indicate Type of Combustic Device(s)	a. Marketer Directs Shipment of Us Oil to Off-Specification Burner b. Marketer Who First Claims the Used Oil Meets the Specification 2. Used Oil Burner - Indicate Type(s) of Combustion Device a. Utility Boller b. Industrial Boller c. Industrial Furnace 3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
A. Characteristics of Nonlisted Hazardous Wastes. (Mark X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)  [Ingitiable 2. Corrosive 3. Reactive (AToxicity (List specific EPA hazardous waste number(s) for the Toxicity characteristic (Doct) (Doct	4. Water 2. industrial Boiler 5. Other - specify 3. industrial Furnace	b. Transfer Facility 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les) a. Process
A. Characteristics of Nonlisted Hazardous Wastes. (Mark X' in the boxes corresponding to the characteristics of nonlisted Hazardous wastes. (Mark X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)  Lignibility 2. Corrosive 3. Reactive (1003) 4. Toxicity (Lists specific PA hazardous waste mumber(s) for the Toxicity characteristic contaminent(s))  X		
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C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See Instructions.)  1 2 3 4 5 6  C. Certification  C.	I     Z       F 0 0 2     F 0 0 3       F 0 0 5     F 0 0 9	5         6           D 0 1 0         D 0 1 1
Certification  I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting fals information, including the possibility of fine and imprisonment for knowing violations.  Identify the property of the pr		
Certification  I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance wife a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting fals information, including the possibility of fine and imprisonment for knowing violations.  Signature  Name and Official Title (Type or print)  Date Signed	C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number;	See instructions.)
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting fals information, including the possibility of fine and imprisonment for knowing violations.  Signature  Name and Official Title (Type or print)  Date Signed  Comments	1 2 3 4 T	5 6
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Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)	II. Comments	The second second
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	vote: Mail completed form to the appropriate EPA Regional or State Office. (See Section	n III of the booklet for addresses.)

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### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

03/01/99

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER →

PRD091101543

INSTALLATION NAME

RHONE POULENC RORER PR INC

INSTALLATION ADDRESS

RD 604 SAN JOSE IND PARK MANATI, PR 00701

MAILING ADDRESS -

PO BOX 345 MANATI, PR 00674

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2 290 BROADWAY, 22<sup>nd</sup> Floor NEW YORK, NEW YORK 10007-1866

ATTN: DIV OF ENVIRON PLANNING & PROTECTION RCRA PROGRAMS BRANCH

TO: CORTES, PEDRO ENVIRONMENTAL PO BOX 345 MANATI, PR 00701

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Form Approved, UMB No. 2050-0028 Expires 10/31/99

Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3019 of the Resource Conservation and

## fication of Regulated Waste Activity

(For Official Use Only)

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Cation of Regular Waste Activity

APRIS

Please print or type with ELITE type (12 charact - per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99

GSA No. 0246-EPA-OT

J-1-12 C11. J K. W. M. J-1. 7

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PROGRAMS BRANCH

RHÔNE-POULENC RORER PUERTO RICO INC.

P.O. BOX 345 MANATI, P.R. 00674 TEL. (809) 854-1058

November 17, 1998

RCRA PERMIT ADMINISTRATION BRANCH USEPA - REGION II Permits Administration Branch 290 Broadway New York, N.Y. 10007 - 1866

RE: NOTIFICATION OF REGULATED WASTE ACTIVITY SECOND NOTICE SUBSEQUENT NOTIFICATION - UPGRADE STATUS REQUEST RHONE - POULENC RORER P.R., INC.
INSTALLATION'S EPA ID NUMBER: PRD091101543

To whom it may concern:

Please find enclosed copy of EPA FORM 8700-12 "Notification of Regulated Waste Activity" regarding a Subsequent Notification for our facility in Manatí, Puerto Rico and sent to Mr. Meyer during the past March 24, 1998. Unfortunately, as of this date we have not received communication of receipt from your office.

This "Subsequent Notification" corresponds to an Upgrade Status Request for our facility from Small Quantity Generator to Generator. The reason for this request is that due to an increase in the manufacturing operations at our facility in Manatí, Puerto Rico more than 1,000 kg/mo. of hazardous wastes, consisting mainly of spent isopropyl alcohol, will be generated. Hazardous wastes will be stored at the facility for less than 90 days, as established. In addition to this notification the facility has prepared a Hazardous Generator Contingency Plan, as established on 40 CFR 403.8, 264 and 265, copy of which is available at the facility.

Should you have any comments or questions regarding the aforementioned, enclosure or any other additional information which might be required, please contact us at (787) 854-1058.

Regards,

José Osorio

Engineering Manager

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

### REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

From: Jack Hoyt, DEPP

To: Petro Contes

Date: JAN / 1998

Subject: Form 8700-12, Notification of Regulated Waste Activity.

Per the advisory of the change in the company status.

Please <u>complete</u> the enclosed form. The form must be signed by the generator to update and register the company file.

Your kind attention to this matter is appreciated.

See high LIGHTED ITEMS

AND AN ORIGINAL SIGNATURE IS NECESSARY

Please return to: Jack Hoyt

US EPA

290 Broadway 22nd Floor

New York, NY 10007-1866

If you have any questions, please phone: (212) 637-4106.

Truly,

Jack Hoyt

**RCRA Permits** 

99 FEB 18 PM 4:43

RHÔNE-POULENC RORER PUERTO RICO INC.

P.O. BOX 345 MANATI, P.R. 00674 TEL. (809) 854-1058

FROGRAMS BRANCH

January 20, 1999

Mr. Jack Hoyt US EPA 290 Broadway 22nd Floor New York, NY 10007-1866

RE: FORM 8700-12 - SUBSEQUENT NOTIFICATION; COMPLETED FORM

**CHANGE STATUS** 

RHONE-POULENC RORER, P.R., INC.

PRD091101543

Dear Mr. Hoyt:

Please find enclosed form 8700-12 completed as requested. Should you have any other comments or questions please contact us at (787) 8541058.

Regards,

Jose Osorio

**Engineering Director** 

c.c. Israel Torres

Director

RCRA PROGRAM

PUERTO RICO ENVIRONMENTAL QUALITY BOARD

Hato Rey, Puerto Rico

ASSESSED DIFFERENCE OF CHE 47.

Report run on: June 21, 2016 - 5:17 PM Version 5.0

#### **User Selection Criteria**

Location:

Puerto Rico, all activities

**Activity Location:** 

None Chosen

Handler ID:

PRD091101543

Group of IDs:

None Chosen

Handler Name:

Handler Universe:

All Facilities Regardless of Universe

Determined Date Range: From: 10/01/1980 To: 06/21/2016

Location County Code: None Chosen

**Evaluation Type:** 

Location City:

Focus Area:

Location Zip Code:

Violation Type:

State District:

None Chosen

Display Code Descrip.: Yes

Sort Order:

Region, State, Handler Name

Display Universes:

Yes

#### Results

Data meeting the criteria you selected follows.

Total Pages: 12

**Total Handlers:1** 

### Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations. violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

### Report Information

Name:

cme foia.rdf

Developed by:

EPA Headquarters, Office of Enforcement and Compliance Assurance

Deployed: Last Updated: June 2006 May 2012

Contact:

rcrainfo.help@epa.gov

Tables Used:

cmecomp3, ccitation3, hreport univ5, lu citation, lu state, hid groups

Libraries:

none

INYX USA, LTD		County	Name / Code: MAN	ATI / PR091		PRD091101543
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	Type: 262.D ype TATE REGULATION	Determined Date: 10/30/200 Actual Compliance Date: 10/30 Citation RCHSW Rule 503A		ed by Agency: State RTC Qualifier: OBSER\		ole Agency: State equence Number: 16
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<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

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YX USA, LTD, P	RD091101543	, BDA SAN JOSE, F	PR, continued -				
Enforcement: Docket:	Activity Location:	PR	Type: 210 Agency: State	Action Date: 09/17/ Responsible I	/2004 Person: EMFD	Identifier: 001 Branch: PRHV	
	ormation: Propos	sed: \$5,000 Fina	al Monetary:	Collected:	Total Final:		
CA Compon		Disposition St		Appeal Ini		Appea	I Resolved:
	Activity Location:	PR	Type: 120	Action Date: 09/24/		Identifier: 001	
Docket:	anti N	Diama altiana Ot	Agency: State	resort tellum protessi and contract tellum t	Person: EMFD	Branch: PRHV	VALUE CLASSICS.
CA Compon	ent: N	Disposition St	atus:	Appeal Ini	tiated:	Appea	I Resolved:
	ocation: PR	Type: 262.A	Determined Date: 10/29	5/1999 Determine	d by Agency: State	Responsibl	e Agency: State
Scheduled Compli Former Citation - S			Actual Compliance Date: (	03/01/2000	RTC Qualifier: OBSER\	/ED Sec	uence Number: 14
CEI Evaluation	09/14/1999	Activity Location: PR	By: State	Identifier: 000	Person: PRZTV	Branch:	Found Violation: YES
Citizen Comp	plaint: NO	Multimedia Inspection	: NO Sampling: No	O Not Subtitle C:	NO Day Zero:		Focus Area:
	Activity Location:	PR	Type: 120	Action Date: 10/25/	1999	Identifier: 000	
Docket:			Agency: State	Responsible F	Person: PRZTV	Branch:	
CA Compone	ent: N	Disposition Sta	atus:	Appeal Ini	tiated:	Appea	Resolved:
Scheduled Compli Former Citation - S	ance Date: 10/16/		Determined Date: 09/16 Actual Compliance Date: 0		d by Agency: State RTC Qualifier: OBSER\		e Agency: State Juence Number: 13
<b>CEI Evaluation</b>	07/16/1997	Activity Location: PR	By: State	Identifier: 000	Person: PRCRO	Branch:	Found Violation: YES
Citizen Comp	olaint: NO	Multimedia Inspection:	NO Sampling: NO	O Not Subtitle C:	NO Day Zero:		Focus Area:
Enforcement:	Activity Location:	PR	Type: 120	Action Date: 09/16/	1997	Identifier: 000	The state of the s
Docket:			Agency: State	Responsible F	Person: PRCMF	Branch:	
CA Compone	ent: N	Disposition Sta	atus:	Appeal Init	tiated:	Appea	Resolved:
olation: Activity Lo Scheduled Complia Former Citation - S	ance Date:	Type: 262.A	Determined Date: 05/28 Actual Compliance Date: 0		d by Agency: State RTC Qualifier: OBSER\		e Agency: State uence Number: 3
FCI Evaluation Citizen Comp	10/26/1992 plaint: NO	Activity Location: PR Multimedia Inspection:	By: State NO Sampling: NO	Identifier: 000  Not Subtitle C:	Person: PRMRR NO Day Zero:	Branch:	Found Violation: YES Focus Area: V3
Enforcement: // Docket:	Activity Location:	PR	Type: 310 Agency: State	Action Date: 09/13/ Responsible F	1994 Person: PRMRF	Identifier: 000 Branch:	
		I. 050 000 F:				-	
Penalty Info	rmation: Propos	ed: \$58,000 Fina	I Monetary: \$37,500	Collected:	Total Final: \$37,50	00	

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

Enforcement:	Activity Location:	PR	Type: 210	Action Date: 09/3	0/1993	Identifier: 000	
Docket:			Agency: State	Responsible	Person: PRMRF	Branch:	
	nformation: Propos		nal Monetary:	Collected:	Total Final:		
CA Compo		Disposition		Appeal I			eal Resolved:
Enforcement:	Activity Location:	PR	Type: 120	Action Date: 05/2		Identifier: 000	
Docket:	ananti N	Dianacition	Agency: State	Responsible Appeal I	Person: PRMRF	Branch:	eal Resolved:
CA Compo	onent, iv	Disposition	Status.	Арреаги	illiateu.	Арр	eal Nesolveu.
/iolation: Activity	Location: PR	Type: 262.A	Determined Date	: 05/28/1993 Determin	ed by Agency: State	Respons	ible Agency: State
Scheduled Com	pliance Date:		Actual Compliance [	Date: 09/13/1994	RTC Qualifier: OBSER\	/ED S	Sequence Number: 4
Former Citation	- SR - rule 812D(3)(a	a)(b)					
FCI Evaluation	10/26/1992	Activity Location: Pl	R By: State	Identifier: 000	Person: PRMRR	Branch:	Found Violation: YES
Citizen Cor	mplaint: NO	Multimedia Inspecti	on: NO Sampl	ing: NO Not Subtitle (	C: NO Day Zero:		Focus Area: V3
Enforcement:	Activity Location:	PR	Type: 310	Action Date: 09/1	3/1994	Identifier: 000	
Docket:	the second season of the second secon		Agency: State	Responsible	Person: PRMRF	Branch:	
Penalty In	nformation: Pena	alty Information Printed	Above				
CA Compo	onent: N	Disposition	Status:	Appeal I			eal Resolved:
Enforcement:	Activity Location:	PR	Type: 210	Action Date: 09/3		Identifier: 000	
Docket:			Agency: State	Responsible	Person: PRMRF	Branch:	
Penalty In		alty Information Printed		Amaadil	sitioto di		I Down book
Penalty In	onent: N	Disposition	Status:	Appeal II			eal Resolved:
Penalty In CA Composition Enforcement:		Disposition	Status: Type: 120	Action Date: 05/2	3/1993	Identifier: 000	eal Resolved:
Penalty In CA Composition Enforcement: Docket:	onent: N Activity Location:	Disposition PR	Status: Type: 120 Agency: State	Action Date: 05/2 Responsible	3/1993 Person: PRMRF	Identifier: 000 Branch:	
Penalty In CA Composition Enforcement:	onent: N Activity Location:	Disposition	Status: Type: 120 Agency: State	Action Date: 05/2	3/1993 Person: PRMRF	Identifier: 000 Branch:	eal Resolved: eal Resolved:
Penalty II CA Compo Enforcement: Docket: CA Compo	onent: N Activity Location:	Disposition PR	Status: Type: 120 Agency: State	Action Date: 05/2 Responsible Appeal I	3/1993 Person: PRMRF	Identifier: 000 Branch: App	
Penalty II CA Compo Enforcement: Docket: CA Compo	onent: N Activity Location: onent: N Location: PR	Disposition PR Disposition	Status: Type: 120 Agency: State Status:	Action Date: 05/2 Responsible Appeal II : 05/28/1993 Determin	3/1993 Person: PRMRF nitiated:	Identifier: 000 Branch: App Respons	eal Resolved:
Penalty In CA Composition: Penalty In CA Composition: Activity Scheduled Com	onent: N Activity Location: onent: N Location: PR	Disposition PR Disposition Type: 262.A	Status: Type: 120 Agency: State Status: Determined Date	Action Date: 05/2 Responsible Appeal II : 05/28/1993 Determin	3/1993 Person: PRMRF nitiated: ed by Agency: State	Identifier: 000 Branch: App Respons	eal Resolved: ible Agency: State
Penalty In CA Composition: Penalty In CA Composition: Activity Scheduled Com	onent: N Activity Location: onent: N Location: PR pliance Date:	Disposition PR Disposition Type: 262.A	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance I	Action Date: 05/2 Responsible Appeal II : 05/28/1993 Determin	3/1993 Person: PRMRF nitiated: ed by Agency: State	Identifier: 000 Branch: App Respons	eal Resolved: ible Agency: State
Penalty In CA Composition Enforcement: Docket: CA Composition: Activity Scheduled Com Former Citation FCI Evaluation	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9)	Disposition PR Disposition Type: 262.A	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance D	Action Date: 05/2 Responsible Appeal II  : 05/28/1993 Determin Date: 09/13/1994	8/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR	Identifier: 000 Branch: App Respons /ED S	eal Resolved: ible Agency: State Sequence Number: 5
Penalty In CA Composition Enforcement: Docket: CA Composition: Activity Scheduled Com Former Citation FCI Evaluation	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9) 10/26/1992 mplaint: NO	Disposition PR Disposition Type: 262.A  Activity Location: Pl Multimedia Inspecti	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance D	Action Date: 05/2 Responsible Appeal II : 05/28/1993 Determin Date: 09/13/1994	3/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR C: NO Day Zero:	Identifier: 000 Branch: App Respons /ED S	eal Resolved: ible Agency: State Sequence Number: 5 Found Violation: YES
Penalty In CA Composition CA Composition: Activity Scheduled Composition FCI Evaluation Citizen Composition CA Composition Composition CA Composition CA Composition CA Composition CA CA COMPOSITION CA CA CA CA CA CA CA CA CA CA CA CA CA	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9) 10/26/1992	Disposition PR Disposition Type: 262.A  Activity Location: Pl Multimedia Inspecti	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance I R By: State on: NO Sampl	Action Date: 05/2 Responsible Appeal In: 05/28/1993 Date: 09/13/1994  Identifier: 000 Ing: NO Not Subtitle 0 Action Date: 09/1	3/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR C: NO Day Zero:	Identifier: 000 Branch: App Respons /ED S Branch:	eal Resolved: ible Agency: State Sequence Number: 5 Found Violation: YES
Penalty In CA Composition CA Composition: Activity Scheduled Composition Citizen College Control Contr	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9) 10/26/1992 mplaint: NO Activity Location:	Disposition PR Disposition Type: 262.A  Activity Location: Pl Multimedia Inspecti	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance I  R By: State on: NO Sampl  Type: 310 Agency: State	Action Date: 05/2 Responsible Appeal In: 05/28/1993 Date: 09/13/1994  Identifier: 000 Ing: NO Not Subtitle 0 Action Date: 09/1	3/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR C: NO Day Zero:	Identifier: 000 Branch: App Respons /ED S Branch: Identifier: 000	eal Resolved: ible Agency: State Sequence Number: 5 Found Violation: YES
Penalty In CA Composition CA Composition: Activity Scheduled Composition Citizen College Control Contr	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9) 10/26/1992 mplaint: NO Activity Location:	Disposition PR Disposition Type: 262.A  Activity Location: Pl Multimedia Inspection	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance I  R By: State on: NO Sampl  Type: 310 Agency: State	Action Date: 05/2 Responsible Appeal II  : 05/28/1993 Determin Date: 09/13/1994  Identifier: 000 Ing: NO Not Subtitle 0  Action Date: 09/1 Responsible  Appeal II	8/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR C: NO Day Zero: 8/1994 Person: PRMRF	Identifier: 000 Branch: App Respons /ED S Branch: Identifier: 000 Branch:	eal Resolved: ible Agency: State Sequence Number: 5 Found Violation: YES
Penalty In CA Composition CA Composition: Activity Scheduled Composition Citizen College Control College Control College Control College Control College Colle	onent: N Activity Location: onent: N Location: PR pliance Date: - SR - rule 704D3(9) 10/26/1992 mplaint: NO Activity Location:	Disposition PR Disposition Type: 262.A  Activity Location: Pl Multimedia Inspecti PR  alty Information Printed Disposition	Status: Type: 120 Agency: State Status:  Determined Date Actual Compliance I  R By: State on: NO Sampl  Type: 310 Agency: State	Action Date: 05/2 Responsible Appeal II  : 05/28/1993 Determin Date: 09/13/1994  Identifier: 000 Ing: NO Not Subtitle 0  Action Date: 09/1 Responsible  Appeal II Action Date: 09/3	8/1993 Person: PRMRF nitiated: ed by Agency: State RTC Qualifier: OBSER\ Person: PRMRR C: NO Day Zero: 8/1994 Person: PRMRF	Identifier: 000 Branch: App Respons /ED S Branch: Identifier: 000 Branch:	eal Resolved: ible Agency: State Sequence Number: 5 Found Violation: YES Focus Area: V3

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

Enforcement: Activity Location	n DD	Type: 120	Action Date: 05/28/1993	Identifier: 000
Docket:	i. FK	Agency: State	Responsible Person: PRMRF	Branch:
CA Component: N	Disposition St	. ,	Appeal Initiated:	Appeal Resolved:
ation: Activity Location: PR Scheduled Compliance Date: Former Citation - SR - rule I 810 c	Type: 262.A	Determined Date: 05/28/1 Actual Compliance Date: 09/	, ,	Responsible Agency: State  /ED Sequence Number: 6
FCI Evaluation 10/26/1992 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection	By: State : NO Sampling: NO	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:	Branch: Found Violation: YES Focus Area: V3
Enforcement: Activity Location Docket:	i: PR	Type: 310 Agency: State	Action Date: 09/13/1994 Responsible Person: PRMRF	Identifier: 000 Branch:
Penalty Information: Pe	enalty Information Printed A			And the section of th
CA Component: N Enforcement: Activity Location	Disposition Start: PR	Type: 210	Appeal Initiated: Action Date: 09/30/1993	Appeal Resolved: Identifier: 000
Docket:  Penalty Information: Pe	enalty Information Printed A	Agency: State	Responsible Person: PRMRF	Branch:
CA Component: N	Disposition St		Appeal Initiated:	Appeal Resolved:
Enforcement: Activity Location  Docket:	170.00 (Inc. 100.00  Type: 120	Action Date: 05/28/1993	Identifier: 000	
CA Component: N	Disposition Sta	Agency: State atus:	Responsible Person: PRMRF Appeal Initiated:	Branch: Appeal Resolved:
ation: Activity Location: PR	Type: 262.A	Determined Date: 05/28/1	993 Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date:	LB	Actual Compliance Date: 09/	13/1994 RTC Qualifier: OBSERV	ED Sequence Number: 7
Scheduled Compliance Date: Former Citation - SR - rule 702 B(	LB	By: State	13/1994 RTC Qualifier: OBSERV  Identifier: 000 Person: PRMRR  Not Subtitle C: NO Day Zero:	Sequence Number: 7  Branch: Found Violation: YES Focus Area: V3
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection:	By: State	Identifier: 000 Person: PRMRR	Branch: Found Violation: YES
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO Enforcement: Activity Location Docket: Penalty Information: Pe	Activity Location: PR Multimedia Inspection: n: PR enalty Information Printed A	By: State : NO Sampling: NO Type: 310 Agency: State bove	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994 Responsible Person: PRMRF	Branch: Found Violation: YES Focus Area: V3  Identifier: 000 Branch:
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location Docket: Penalty Information: Pe	Activity Location: PR Multimedia Inspection:  PR  PR  Printed A  Disposition Sta	By: State : NO Sampling: NO Type: 310 Agency: State bove atus:	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated:	Branch: Found Violation: YES Focus Area: V3  Identifier: 000 Branch:  Appeal Resolved:
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location Docket: Penalty Information: Per CA Component: N  Enforcement: Activity Location Docket:	Activity Location: PR Multimedia Inspection:  PR  enalty Information Printed A  Disposition Sta	By: State : NO Sampling: NO  Type: 310 Agency: State bove atus: Type: 210 Agency: State	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994 Responsible Person: PRMRF	Branch: Found Violation: YES Focus Area: V3  Identifier: 000 Branch:
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location Docket: Penalty Information: Pe CA Component: N  Enforcement: Activity Location Docket: Penalty Information: Pe	Activity Location: PR Multimedia Inspection:  PR  enalty Information Printed A Disposition State: PR  enalty Information Printed A	By: State : NO Sampling: NO  Type: 310    Agency: State bove atus: Type: 210    Agency: State bove	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated: Action Date: 09/30/1993 Responsible Person: PRMRF	Branch: Found Violation: YES Focus Area: V3  Identifier: 000 Branch:  Appeal Resolved: Identifier: 000 Branch:
Scheduled Compliance Date: Former Citation - SR - rule 702 B( FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location Docket: Penalty Information: Pe CA Component: N  Enforcement: Activity Location Docket:	Activity Location: PR Multimedia Inspection:  PR  enalty Information Printed A Disposition State: PR  enalty Information Printed A Disposition State: PR	By: State : NO Sampling: NO  Type: 310    Agency: State bove atus: Type: 210    Agency: State bove	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated: Action Date: 09/30/1993	Branch: Found Violation: YES Focus Area: V3  Identifier: 000 Branch:  Appeal Resolved: Identifier: 000

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

Scheduled Com	Location: PR bliance Date: · SR - rule 803E (6)	Type: 26			nined Date: 05/28/19 mpliance Date: 09/1		ed by Agency: RTC Qualifi	State er: OBSERVED		ponsible Agency: State Sequence Number: 8
FCI Evaluation Citizen Cor	10/26/1992 nplaint: NO		Location: PR edia Inspection:		State Sampling: NO	Identifier: 000 Not Subtitle (	Person: F C: NO	PRMRR E Day Zero:	Branch:	Found Violation: YES Focus Area: V3
Enforcement: Docket:	Activity Location:	PR		Type: 310 Agency:		Action Date: 09/1 Responsible	3/1994 Person: PRM		Identifier: ( Branch:	000
		alty Inform	ation Printed Ab							
CA Compo	and the second s		Disposition Sta			Appeal I				Appeal Resolved:
Enforcement: Docket:	Activity Location:			Type: 210 Agency:		Action Date: 09/3 Responsible	0/1993 Person: PRM		Identifier: ( Branch:	000
2 March 200 Co. 100		alty Inform	ation Printed Ab	1000						
CA Compo			Disposition Sta			Appeal I				Appeal Resolved:
Enforcement:	Activity Location:	PR	7	Type: 120		Action Date: 05/2			Identifier: (	000
Docket:	and the same		D: "" O!	Agency:	State		Person: PRM	KF.	Branch:	
CA Compo	onent: N		Disposition Sta	tus:		Appeal I	nitiated:			Appeal Resolved:
olation: Activity	Location: PR	Type: 26	32 A	Determ	nined Date: 05/28/19	193 Determin	ed by Agency:	State	Res	ponsible Agency: State
Scheduled Comp		.,,,,			mpliance Date: 09/1		, , ,	er: OBSERVED		Sequence Number: 9
	SR - rule 803E (7)									Soquenes manuser. 5
FCI Evaluation	10/26/1992	Activity I	Location: PR	Bv:	State	Identifier: 000	Person: F	RMRR F	Branch:	Found Violation: YES
Citizen Cor	nplaint: NO	,	edia Inspection:		Sampling: NO	Not Subtitle (	C: NO	Day Zero:		Focus Area: V3
Enforcement:	Activity Location:	PR		Type: 310		Action Date: 09/1	3/1994		Identifier: 0	000
Docket:				Agency:	State	Responsible	Person: PRM	₹F	Branch:	
	THE CONTRACTOR OF THE STATE OF	alty Inform	ation Printed Ab							
CA Compo			Disposition Sta			Appeal I				Appeal Resolved:
Enforcement:	Activity Location:	PR		Type: 210		Action Date: 09/3	E.O. C. (2)(2)(2)		Identifier: 0	000
Docket:	1			Agency:	State	Responsible	Person: PRM	₹F	Branch:	
		alty Inform	ation Printed Ab							-000 NW State
	nent: N		Disposition Sta	tus:		Appeal I				Appeal Resolved:
CA Compo		DD		T 400			0/4000			000
Enforcement:	Activity Location:	PR		Type: 120		Action Date: 05/2			Identifier: 0	000
	Activity Location:	PR	Disposition Sta	Agency:			Person: PRM		Identifier: 0 Branch:	000 Appeal Resolved:

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

CHARLES	B, BDA SAN JOSE, PR,	And Land			
olation: Activity Location: PR Scheduled Compliance Date: Former Citation - SR - rule 803E (a)	Type: 262.A	Determined Date: 05/28/19 ctual Compliance Date: 09/1	, · g, ·		ible Agency: State equence Number: 10
FCI Evaluation 10/26/1992 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:	Branch:	Found Violation: YES Focus Area: V3
Enforcement: Activity Location: Docket:	comwealth season	pe: 310 Agency: State	Action Date: 09/13/1994 Responsible Person: PRMRF	Identifier: 000 Branch:	MO LAKETY!
	alty Information Printed Abov		acculous and the supplier of the su	DE MERCES	
CA Component: N	Disposition Status		Appeal Initiated:	Appe	eal Resolved:
Enforcement: Activity Location:  Docket:		pe: 210 Agency: State	Action Date: 09/30/1993 Responsible Person: PRMRF	Identifier: 000 Branch:	
	alty Information Printed Abov		TOROLDA DON BARRY CALLEY		
CA Component: N	Disposition Status	and I staylar and the little of	Appeal Initiated:	Appe	eal Resolved:
Enforcement: Activity Location: Docket:		oe: 120 Agency: State	Action Date: 05/28/1993 Responsible Person: PRMRF	Identifier: 000 Branch:	
CA Component: N	Disposition Status	c .	Appeal Initiated:	Appe	eal Resolved:
	Type: 262.A	Determined Date: 05/28/19	03 Determined by Agency: State		
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO	Ac	ctual Compliance Date: 09/1:  By: State  D Sampling: NO	- Julian Ly Garray. Comit	/ED S	ible Agency: State equence Number: 11 Found Violation: YES Focus Area: V3
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992	Activity Location: PR Multimedia Inspection: NC	By: State  Sampling: NO  De: 310	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994	/ED S Branch: Identifier: 000	equence Number: 11 Found Violation: YES
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket:	Activity Location: PR Multimedia Inspection: NC PR Typ	By: State Sampling: NO De: 310 Agency: State	RTC Qualifier: OBSER\ Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:	/ED S	equence Number: 11 Found Violation: YES
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket:	Activity Location: PR Multimedia Inspection: NC	By: State D Sampling: NO De: 310 Agency: State e	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero:  Action Date: 09/13/1994	/ED S  Branch:  Identifier: 000  Branch:	Found Violation: YES Focus Area: V3
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket: Penalty Information: Penalty CA Component: N	Activity Location: PR Multimedia Inspection: NC PR Typ A alty Information Printed Above Disposition Status	By: State D Sampling: NO De: 310 Agency: State e	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero: Action Date: 09/13/1994 Responsible Person: PRMRF	/ED S  Branch:  Identifier: 000  Branch:	equence Number: 11 Found Violation: YES
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket: Penalty Information: Pen CA Component: N  Enforcement: Activity Location: Docket:	Activity Location: PR Multimedia Inspection: NC PR Typ A alty Information Printed Above Disposition Status PR Typ A	By: State D Sampling: NO De: 310 Agency: State e De: 210 Agency: State	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero: Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated:	Branch:  Identifier: 000 Branch:	Found Violation: YES Focus Area: V3
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket: Penalty Information: Pen CA Component: N  Enforcement: Activity Location: Docket: Penalty Information: Pen	Activity Location: PR Multimedia Inspection: NC PR Typ A alty Information Printed Above Disposition Status PR Typ A alty Information Printed Above	By: State D Sampling: NO De: 310 Agency: State e De: 210 Agency: State e	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero: Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated: Action Date: 09/30/1993 Responsible Person: PRMRF	Branch:  Identifier: 000 Branch:  Appelidentifier: 000 Branch:	Found Violation: YES Focus Area: V3 eal Resolved:
Scheduled Compliance Date: Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket: Penalty Information: Pen CA Component: N  Enforcement: Activity Location: Docket: Penalty Information: Pen CA Component: N	Activity Location: PR Multimedia Inspection: NC PR Typ A alty Information Printed Above Disposition Status PR Typ A alty Information Printed Above Disposition Status Status Disposition Status	By: State D Sampling: NO De: 310 Agency: State e De: 210 Agency: State e E: State E:	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero: Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated: Action Date: 09/30/1993 Responsible Person: PRMRF  Appeal Initiated:	Branch:  Identifier: 000 Branch:  Appelidentifier: 000 Branch:	Found Violation: YES Focus Area: V3
Former Citation - SR - rule502 A (2) FCI Evaluation 10/26/1992 Citizen Complaint: NO  Enforcement: Activity Location: Docket: Penalty Information: Pen CA Component: N  Enforcement: Activity Location: Docket: Penalty Information: Pen	Activity Location: PR Multimedia Inspection: NC PR Typ A alty Information Printed Above Disposition Status PR Typ A alty Information Printed Above Disposition Status Typ A Ty	By: State D Sampling: NO De: 310 Agency: State e Si: De: 210 Agency: State e Si: De: 120 Agency: State	Identifier: 000 Person: PRMRR Not Subtitle C: NO Day Zero: Action Date: 09/13/1994 Responsible Person: PRMRF  Appeal Initiated: Action Date: 09/30/1993 Responsible Person: PRMRF	Branch:  Identifier: 000 Branch:  Appelidentifier: 000 Branch:	equence Number: 11  Found Violation: YES Focus Area: V3  eal Resolved:

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

olation: Activity Location: PR Scheduled Compliance Date:	21	Determined Date: 05/28/1993 ual Compliance Date: 09/13/		l by Agency: State RTC Qualifier: OBSERV		nsible Agency: State Sequence Number: 12
Former Citation - SR - rule 205 A (1)		au compliance bate. correr	1001	TO Guamer, OBOLICO		Coquente rumber. 12
FCI Evaluation 10/26/1992	Activity Location: PR	-,	Identifier: 000	Person: PRMRR	Branch:	Found Violation: YES
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C:	NO Day Zero:		Focus Area: V3
Enforcement: Activity Location: Docket:		e: 310 gency: State	Action Date: 09/13/1 Responsible P	1994 erson: PRMRF	Identifier: 000 Branch:	
	alty Information Printed Above					
CA Component: N	Disposition Status:		Appeal Initi		The second secon	peal Resolved:
Enforcement: Activity Location:  Docket:	**	e: 210	Action Date: 09/30/1	1993 erson: PRMRF	Identifier: 000 Branch:	
	alty Information Printed Above	gency: State	Responsible P	eison. Privirr	Diancii.	
CA Component: N	Disposition Status:		Appeal Initi	iated:	Ar	ppeal Resolved:
Enforcement: Activity Location:		e: 120	Action Date: 05/28/1		Identifier: 000	Annual Control of the
Docket:	• • • • • • • • • • • • • • • • • • • •	jency: State	Responsible P	erson: PRMRF	Branch:	
CA Component: N	Disposition Status:		Appeal Initi	iated:	Ap	ppeal Resolved:
	T	2.1	0 0.4	L A 01-1-	D	
iolation: Activity Location: PR		Determined Date: 02/29/1988		by Agency: State RTC Qualifier: OBSERV		nsible Agency: State
Scheduled Compliance Date: 03/24	1900 ACI	ual Compliance Date: 03/28/	1900	RTC Qualifier. OBSERV	ED	Sequence Number: 2
NRR Evaluation 02/29/1988	Activity Location: PR	By: State	Identifier: 002	Person: PREQB	Branch:	Found Violation: YES
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C:	NO Day Zero:		Focus Area:
Enforcement: Activity Location:	PR Type	e: 120	Action Date: 03/14/1	1988	Identifier: 002	
Docket:	Ąç	gency: State	Responsible P	erson: PREQB	Branch:	
CA Component: N	Disposition Status:		Appeal Initi	iated:	Ap	ppeal Resolved:
iolation: Activity Location: PR	Type: 262.B	Determined Date: 07/30/1986	5 Determined	by Agency: State	Respor	nsible Agency: State
iolation: Activity Location: PR				RTC Qualifier: OBSERV	FD	Sequence Number: 1
Scheduled Compliance Date: 08/14	/1986 Acti	ual Compliance Date: 08/26/	1986	KTC Qualifier, OBSERV		
Scheduled Compliance Date: 08/14		A STATE OF THE PARTY OF THE PAR	1986 Identifier: 001	Person: PREQB	Branch:	Found Violation: YES
•	/1986 Activity Location: PR Multimedia Inspection: NO	And the second of the second o		Person: PREQB		Found Violation: YES Focus Area:
Scheduled Compliance Date: 08/14 NRR Evaluation 07/30/1986	Activity Location: PR Multimedia Inspection: NO	By: State	Identifier: 001	Person: PREQB NO Day Zero:		
Scheduled Compliance Date: 08/14 NRR Evaluation 07/30/1986 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO PR Type	By: State Sampling: NO	Identifier: 001 Not Subtitle C: Action Date: 08/04/1	Person: PREQB NO Day Zero:	Branch:	
Scheduled Compliance Date: 08/14 NRR Evaluation 07/30/1986 Citizen Complaint: NO Enforcement: Activity Location:	Activity Location: PR Multimedia Inspection: NO PR Type	By: State Sampling: NO	Identifier: 001 Not Subtitle C: Action Date: 08/04/1	Person: PREQB NO Day Zero: 1986 erson: PREQB	Branch:  Identifier: 001  Branch:	
Scheduled Compliance Date: 08/14 NRR Evaluation 07/30/1986 Citizen Complaint: NO Enforcement: Activity Location: Docket:	Activity Location: PR Multimedia Inspection: NO PR Type	By: State Sampling: NO	Identifier: 001 Not Subtitle C: Action Date: 08/04/1 Responsible P	Person: PREQB NO Day Zero: 1986 erson: PREQB	Branch:  Identifier: 001  Branch:	Focus Area:
Scheduled Compliance Date: 08/14 NRR Evaluation 07/30/1986 Citizen Complaint: NO Enforcement: Activity Location: Docket: CA Component: N	Activity Location: PR Multimedia Inspection: NO PR Type	By: State Sampling: NO e: 120 gency: State	Identifier: 001 Not Subtitle C: Action Date: 08/04/1 Responsible P	Person: PREQB NO Day Zero: 1986 erson: PREQB	Branch:  Identifier: 001  Branch:	Focus Area:

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

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INYX USA, LTD, PRD091101543, BDA SAN JOSE, PR, continued -

CEI Evaluation 12/06/2006 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Person: ESRL  Not Subtitle C: NO Day Zero:	Branch: PRHWCI Found Violation: NO 12/06/2006 Focus Area:
CEI Evaluation 02/01/2006 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	A Section of the sect	Identifier: 001 Person: R2OSK  Not Subtitle C: NO Day Zero:	Branch: RCB Found Violation: NO Focus Area:
CEI Evaluation 08/02/2005 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Person:  Not Subtitle C: NO Day Zero:	Branch: Found Violation: U Focus Area:
CEI Evaluation 09/24/2003 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	And the second s	Identifier: 001 Person: EMFD  Not Subtitle C: NO Day Zero:	Branch: Found Violation: U Focus Area:
SNY Evaluation 09/24/2003 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 002 Person: EMFD  Not Subtitle C: NO Day Zero:	Branch: Found Violation: N/A Focus Area:
CEI Evaluation 09/11/2001 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Person: ESRL  Not Subtitle C: NO Day Zero:	Branch: Found Violation: NO Focus Area:
CEI Evaluation 09/08/2000 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Person: ESRL  Not Subtitle C: NO Day Zero:	Branch: Found Violation: NO Focus Area:
CEI Evaluation 02/03/1998 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	By: EPA Sampling: NO	Identifier: 000 Person: R2TM Not Subtitle C: NO Day Zero:	Branch: RCB Found Violation: NO Focus Area:
SNN Evaluation 09/13/1994 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO		Identifier: CV3 Person:  Not Subtitle C: NO Day Zero:	Branch: Found Violation: NO Focus Area:
SNY Evaluation 05/28/1993 Citizen Complaint: NO	Activity Location: PR Multimedia Inspection: NO	•	Identifier: CNV Person: Not Subtitle C: NO Day Zero:	Branch: Found Violation: N/A Focus Area:

Total Number of Handlers:

w ,ard

**Total Number of Activity Locations:** 

<sup>\*</sup> End of Report \*

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

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### Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
El Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators.  HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control;  'N' indicates the exposure does not exist)  GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control;  'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

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## Description of codes used on the report:

Code	Description
В	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
С	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

	ER - indicates that the handler has been identified through a source other than Notification and fonducting RCRA-regulated activities without proper authority:
Code	Description
Е	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
0	indicates that the handler is a former non-notifier.
Х	indicates that the handler is a non-notifier.

Violation Type	Description	
262.A	GENERATORS - GENERAL	
262.B	GENERATORS - MANIFEST	
262.D	GENERATORS - RECORDS/REPORTING	
202.0		

Evaluation Type	Type Description	
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	
FCI	FOCUSED COMPLIANCE INSPECTION	
NRR	NON-FINANCIAL RECORD REVIEW	
SNN	NOT A SIGNIFICANT NON-COMPLIER	
SNY	SIGNIFICANT NON-COMPLIER	

Focus Area	Description	
V3	CONVERTED FROM V2 RCRAINFO	AL ENGROSINSHIP

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.

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### Description of codes used on the report:

Enforcement Type	Enforcement Description	
120	WRITTEN INFORMAL	
210	INITIAL 3008(A) COMPLIANCE	
310	FINAL 3008(A) COMPLIANCE ORDER	

<sup>\*</sup> Note: Penalty amount may not reflect all violations cited.